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March 3, 2008  
**Via ECFS**

Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36**  
**2007 CPNI Certification Filing**  
**AmeriVision Communications, Inc. d/b/a Affinity 4 - Form 499 Filer ID**  
**815133**

Dear Ms. Dortch:

Enclosed for filing is the 2007 CPNI Compliance Certification submitted on behalf of AmeriVision Communications, Inc. d/b/a Affinity 4. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 08-171 issued January 29, 2008.

Any questions you may have concerning this filing may be directed to me at 470-740-3001 or via email to [tforte@tminc.com](mailto:tforte@tminc.com).

Sincerely,

Thomas M. Forte  
Consultant to  
AmeriVision Communications, Inc. d/b/a Affinity 4

Attachments

cc: FCC Enforcement Bureau (provided via ECFS)  
Best Copy and Printing (via email to [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
L. Woodley - AmeriVision (via e-mail)  
file: AmeriVision – CPNI  
tms: FCCx0801

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for Calendar Year: 2007

Name of company covered by this certification: AmeriVision Communications, Inc.  
d/b/a Affinity 4

Form 499 Filer ID: 815133

Name of signatory: Loni Woodley

Title of signatory: Treasurer / V.P.

I, Loni Woodley, certify and state that:

1. I am the Treasurer / V.P. of AmeriVision Communications d/b/a Affinity 4 ("Affinity 4") and, acting as an agent of the company, I have personal knowledge of Legacy's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, Affinity 4's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U and that the company qualifies as a small business entity under the Regulatory Flexibility Act or Small Business Act because it is an IXC reseller with fewer than 1500 employees.
3. Attached to this certification as Exhibit A is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

Loni Woodley, Treasurer / V.P.

AmeriVision Communications, Inc. d/b/a Affinity 4

3/3/08

Date

**Exhibit A**  
**Statement of CPNI Procedures and Compliance**

**AmeriVision Communications, Inc. d/b/a Affinity 4**  
**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**

**AmeriVision Communications, Inc. d/b/a Affinity 4**, ("Affinity 4" or "Company") provides presubscribed and casual calling (dial around) long distance services to residential and business customers. The Company provides the following as its Statement of CPNI compliance.

The Company uses CPNI, upon occasion, to market services to its customers and notifies its customers of their right to restrict use of, disclosure, and access to their CPNI, prior to asking for approval to use CPNI. Customer approval is obtained using opt-out approval and the Company establishes and maintains records establishing that notice was provided and approval was obtained. The Company maintains a record of all sales and marketing campaigns that use CPNI.

Affinity 4 utilizes both direct billing and LEC billing and has taken steps to secure CPNI and manage its release in accordance with FCC rules. The company has put into place processes to safeguard its customers' CPNI and call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to CPNI.

User account information can only be accessed by authorized representatives of the company. Such authorized representatives have access to customer records management systems only via an established password protected account set-up in their name by a system administrator. When the Company agent accesses customer information of any type, an audit log is created on the account that indicates the company agent that accessed the records. Additionally, access to CPNI used for the purpose of reporting and managing the business is centralized to the Company' Reporting Group that has limited password access to customer information.

Every employee that has access to CPNI is trained by the Company. All customer service personnel go through special CPNI training and must take and pass a test to ensure that they understand the policy. The marketing department has likewise been trained by the legal department regarding when and how they may use CPNI.

Call detail information is provided over the telephone to customers. An account User Name and Password at the time the customer account is established and provided to the Customer as part of the welcome package. Should a customer forget or lose the password, such information can be provided to the customer at the email address established then the account was set up. If the customer cannot provide the correct password or response to any back-up authentication methods the Company requires a new password be established. If the customer cannot provide the password or backup authentication question response, and the customer question does not fall into the exception where the call detail information is provided by the customer to the Customer Service Representative, then call detail can only be provided by mail to the customer's address of record, or by calling the customer at the telephone number of records.

**AmeriVision Communications, Inc. d/b/a Affinity 4**  
**STATEMENT OF CPNI PROCEDURES AND COMPLIANCE**  
**(Continued)**

The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

Affinity 4 is not yet subject to the on-line requirement and will be in full compliance including authentication procedures to safeguard the disclosure of CPNI, establishment back-up authentication procedures for lost or stolen passwords that do not prompt the customer for readily available biographical or account information, by June 8, 2008.

The Company does not have retail locations and therefore does not disclose CPNI in-store.

Company notifies customers via a previously established email address or mails to the customer address of record, all notifications regarding account changes (without revealing the changed information or sending the notification to the new account information) : password changes, change in a response to a back-up means of authentication, change to an on-line account, change or creation of an address of record other than at service initiation.

The Company has not taken any actions against data brokers in the last year.

The Company does have procedures in place to notify law enforcement (United States Secret Service and FBI) of a breach of a customer's CPNI within seven (7) business days, and to notify customers of the breach. The company maintains a record of any breaches discovered and notifications made to the USSS and FBI. The customer's electronic record is updated with information regarding notifications on CPNI breaches.

The Company has not received any complaints about unauthorized release or disclosure of CPNI for the last calendar year.

The Company has not developed any information with respect to the processes that pretexters are using to attempt to access CPNI.